

DOCKET FILE COPY ORIGINAL ORIGINAL

Before The  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED

DEC 17 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Advanced Television Systems ) MM Docket No. 87-268  
and Their Impact Upon the )  
Existing Television Broadcast )  
Service )

To: The Commission

**COMMENTS ON MSTV PROPOSED DTV TABLE OF ALLOTMENTS**

WITF, Inc. ("WITF"), licensee of noncommercial educational television station WITF-TV, Harrisburg, Pennsylvania, by its counsel, provides these comments on the modified DTV table of allotments, as proposed by the "Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments Submitted by the Association for Maximum Service Television, Inc. and Other Broadcasters," filed November 20, 1997 (the "MSTV Submission").<sup>1/</sup> While sympathetic to the concerns underlying MSTV's proposed changes in the Table, WITF opposes one particular change--the proposed substitution of DTV Channel 4 for Channel 36 at Station WITF-TV, which now operates on NTSC Channel \*33. The use of DTV Channel 4 instead of Channel 36, as specified in the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"), would cause severe harm to WITF.

---

<sup>1/</sup> By Public Notice dated December 2, 1997, the Commission provided until December 17, 1997, for interested parties to comment on the MSTV Submission.

No. of Copies rec'd  
List ABCDE

054

Under the MSTV proposal, WITF would have the only VHF DTV assignment in an otherwise all UHF market. This would require WITF-TV viewers to install a second outside antenna. VHF receive antennas are large, cumbersome, and unlikely to be used by many viewers. Thus, requiring WITF-TV to operate on DTV Channel 4 would place the station in jeopardy of lost viewership, underwriting and public support.

Also, the Channel 4 allotment is outside the core channel spectrum, likely requiring WITF to change channel assignments again at the end of the transition. The lower VHF band has been shown by ATTC not to be ideal for DTV because of the effect of impulse noise on reliable transmission in the fringes of the viewing area. Thus, again, the allotment would compromise WITF's ability to deliver its DTV signal to its current viewers.

WITF presumes that MSTV's suggestion to change the DTV table in this respect relates to a "close spacing" between the FCC's DTV allotment for WITF-TV, Channel 36, and an NTSC adjacent channel station (WYBE, Channel 35, Philadelphia), 78 miles away. WITF does not believe, however, that the spacing between DTV Channel 36 at Harrisburg and NTSC Channel 35 at Philadelphia is a critical issue. Interestingly, the same adjacent channel situation would still exist under the MSTV table, but in reverse. MSTV continues with the FCC's specification of DTV Channel 34 for WYBE, which is adjacent to WITF-TV's NTSC channel.

Finally, MSTV's proposed change for WITF-TV's DTV channel would interfere with WITF's chance to be a beta test site for mid-powered UHF DTV products. If WITF

cannot be a test site, it would lose its opportunity to become a DTV pioneer by providing early public DTV and multi-casting service throughout central Pennsylvania. It would also result in the waste of significant out-of-pocket expenses already incurred by WITF to complete its structural capacity study.

For all these reasons, WITF opposes the MSTV Submission insofar and to the extent that it proposes the substitution of DTV Channel 4 for Channel 36 for WITF-TV. WITF urges the Commission to accommodate the technical concerns legitimately raised by MSTV in some other way.

Respectfully submitted,

WITF, Inc.

By: \_\_\_\_\_

*Todd D. Gray*

Todd D. Gray  
Its Attorney

Dow, Lohnes & Albertson, pllc  
1200 New Hampshire Avenue, N.W.  
Suite 800  
Washington, D.C. 20036-6802  
202-776-2571

December 17, 1997

CERTIFICATE OF SERVICE

I certify that I have this 17th day of December, 1997, served copies of the foregoing "Comments on MSTV Proposed DTV Table of Allotments" by First Class U.S. Mail or by hand delivery upon the following:

Richard M. Smith\*  
Chief, Office of Engineering and Technology  
Federal Communications Commission  
2000 M Street, N.W.  
Washington, D.C. 20554

Clay Pendarvis, Esq.\*  
Chief, TV Branch  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Jonathan D. Blake, Esq.  
Ellen P. Goodman, Esq.  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044-7566  
Counsel for MSTV

A handwritten signature in cursive script, reading "Madeline Curtis", written over a horizontal line.

\*denotes service by hand delivery